

PATRICIA CORBOSIERO,
Plaintiff,
vs.
UNIVERSAL HEALTH SERVICES, INC.,
as Plan Administrator for the Universal
Health Services, Inc. Group Supplemental
Dependent Life and Accidental Death and
Dismemberment Plan for employees of
Universal Health Services, Inc. (“Plans”);
HARTFORD LIFE AND ACCIDENT
INSURANCE CO., as Claims Administrator
for the Plans; DOES I through X, and ROE
CORPORATIONS I through X, inclusive,
Defendants.

CASE NO.: 2:16-cv-00834-JCM-CWH

**STIPULATION AND ORDER TO
EXTEND DEADLINES**

(FIRST REQUEST)

1 UHS as to her position regarding permissible ERISA discovery on September 30, 2016.

2 The mediation between Plaintiff and HARTFORD scheduled for October 11, 2016
3 did not take place because Plaintiff was affected by Hurricane Matthew and was unable to
4 travel to Las Vegas in time for the mediation. The mediation has now been rescheduled for
5 January 24, 2017 with the same mediator, Honorable Lawrence Leavitt (Ret.). This was the
6 earliest possible date that all parties and the mediator were available for the mediation.

7 **II. Discovery Remaining and Reason for Request for Extension**

8 The current upcoming deadline for Plaintiff CORBOSIERO to notify Defendant
9 HARTFORD as to the content of Hartford's AR and any ERISA discovery is October 25,
10 2016. In the interest of judicial economy, Plaintiff CORBOSIERO and Defendant
11 HARTFORD propose that all remaining deadlines between them be extended beyond the
12 January 24, 2017 mediation to allow for possible settlement.

13 Plaintiff's dispositive motion regarding her second cause of action against Defendant
14 UHS is currently due by November 4, 2016. Plaintiff and UHS are currently attempting to
15 resolve this claim and therefore propose that all briefing deadlines be extended 30 days.

16 **III. Proposed Discovery Schedule**

17 **A. Plaintiff's first cause of action against Hartford:**

18 Plaintiff CORBOSIERO and Defendant HARTFORD propose the following deadline
19 extensions regarding Plaintiff's First Cause of Action against Defendant HARTFORD (Doc
20 #20, ¶¶ III.A through III.D):

21 <u>Description:</u>	<u>Current Deadline:</u>	<u>Proposed:</u>
22 Plaintiff to notify Defendant Hartford 23 as to the content of AR and any additional discovery	10/25/16	01/27/17
24 Deadline to serve discovery that the 25 parties agree is permissible	11/22/16	02/24/17
26 Filing of Simultaneous Discovery Motions	12/02/16	03/10/17

1 Plaintiff's Dispositive ERISA Motion 12/16/16 03/24/17
under Rule 52 and/or 56

2 Hartford's Opposition to Dispositive 01/20/17 04/21/17
3 Motion

4 Plaintiff's Reply 02/03/17 05/05/17

5 **B. Plaintiff's second cause of action against UHS:**

6 Plaintiff CORBOSIERO and Defendant UHS propose a 30-day extension of their
7 remaining deadlines (Doc #20, ¶ IV.D):

8 <u>Description:</u>	<u>Current Deadline:</u>	<u>Proposed:</u>
9 Plaintiff's Dispositive Motion under	11/04/16	12/02/16
10 Rule 52 and/or 56		
11 UHS's opposition to Dispositive	12/09/16	01/09/17
12 Motion		
12 Plaintiff's Reply	12/30/16	01/30/17

13 We, the undersigned, represent to the Court that this request for extension is made in
14 good faith and not for purposes of delay.

15 WHEREFORE, the parties jointly request that this Court adopt the proposed
16 scheduling as indicated above.

17 DATED: October 14, 2016

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23 DATED: October 14, 2016

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IT IS SO ORDERED.

Dated this 17th day of October, 2016.


UNITED STATES MAGISTRATE JUDGE